

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

FRANK BONARRIGO,

Plaintiff,

v.

**HALL JOHNSON EXXON,
JOHN DOES 1-10, and
X,Y, Z CORPORATIONS,**

Defendants.

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Case No. 3:12-cv-00017-B

**DEFENDANT'S SECOND AGREED MOTION TO EXTEND TIME TO
ANSWER, MOVE OR OTHERWISE RESPOND TO PLAINTIFF'S
COMPLAINT AND JURY DEMAND**

Defendant Hall Johnson Exxon moves the Court for an order extending Defendant's time to respond to Plaintiff Frank Bonarrigo's Complaint and Jury Demand and would show the Court as follows:

1. On January 4, 2012, Plaintiff filed his Complaint and Jury Demand in the above-entitled action.
2. On February 3, 2012, counsel for Plaintiff sent a copy of said Complaint to Defendant via certified mail return receipt requested.
3. On February 23, 2012, counsel for the Parties conferred and agreed that the time for Hall Johnson Exxon to answer, move or otherwise respond to Plaintiff Frank Bonarrigo's Complaint and Demand for Jury Trial would be extended until March 23, 2012.

4. After Defendant filed an agreed motion, on February 29, 2012, the Court entered an order extending Defendant's time to answer, move or otherwise respond to Plaintiff Frank Bonarrigo's Complaint and Demand for Jury trial until March 23, 2012.

5. On March 19, 2012, counsel for the Parties conferred and agreed that an additional 14 day extension of Hall Johnson Exxon's time to answer, move or otherwise respond to Plaintiff Frank Bonarrigo's Complaint and Demand for Jury Trial was necessary so that the parties can explore resolution of this matter.

Wherefore, Defendant Hall Johnson Exxon respectfully requests the Court to enter an order extending its time to answer, move or otherwise respond to Plaintiff Frank Bonarrigo's Complaint and Demand for Jury Trial until April 6, 2012.

Respectfully Submitted,

s/ Megan K. Dredla
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**ATTORNEYS FOR
DEFENDANT
HALL JOHNSON EXXON**

CERTIFICATE OF CONFERENCE

I hereby certify that on March 19, 2012, I conferred with counsel for Plaintiff and she agreed to the relief sought by this motion.

s/ Megan K. Dredla

Megan K. Dredla

CERTIFICATE OF SERVICE

I hereby certify that on March 20, 2012, I filed the foregoing document with the clerk of the U.S. District Court, Northern District of Texas, using the electronic filing system of the Court, which will send notice of such filing to all counsel of record.

s/ Megan K. Dredla

Megan K. Dredla